

P.1

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: *Melissa Bray*

Address: *2121 PEACE ST NW
WARREN, OH, 44483*

RECEIVED
EPA
CORR. CONTROL
40314
90NOV14 P 2:50

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: *Ronald D. Gilbert*

Address: DONALD D. GILBERT
4160 NORTH PARK AV EX
CORTLAND, OHIO 44410

RECEIVED
EPA
CORR. CONTROL
40315
90NOV14 P2:50



GREGORY OPTICS

Consulting Engineer-Design-Fabrication

Oct 30 90

Wm. K Reilly, EPA Administrator
Washington DC

Dear Mr Reilly

Mn gasoline additive

I suppose you've read the enclosed review of the manganese additive situation.

Considering the huge problem we got into with the lead additive, I consider it unthinkable that we risk the same catastrophe again with an unknown new routine.

To expose ourselves and our progeny to such a risk is very high stakes gambling by the Ethyl Corp. stockholders, and should be considered unthinkable by those responsible for our future health.

Please: your action is vital.

Sincerely
John Gregory

RECEIVED
EPA
CORR. CONTROL

90NOV 2 P 1:45

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

ENVIRONMENTAL DEFENSE FUND

Since 1967 — The Power of Positive Solutions
257 Park Avenue South, New York, NY 10010

Forwarding and Return Postage Guaranteed
Address Correction Requested

Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

PEEL OFF FOR ORDER FORM INSIDE
02565623 RWI901
J GREGORY
RR A
DRIPPING SPRINGS TX 78620

NON-PROFIT ORG.
U.S. POSTAGE
PAID
ENVIRONMENTAL
DEFENSE FUND

EDF Letter

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

6 Nov 1990

EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly,

Please do NOT allow the Ethyl Corp.
to use methycyclopentadienyl manganese
tricarbonyl (MMT) as an octane -
enhancing gasoline additive.

We must do all we can to give our
country back its clear, blue skies!

Respectfully,

Mary Nilsson

9406 - Whitely Pl. NW

Seattle, WA. 98117

RECEIVED

EPA
CORR. CONTROL

39779

90NOV 13 All : 24

Howard Frankl
5905 Soquel Dr. Suite 600
Soquel, CA 95073

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

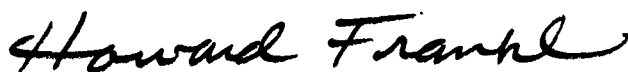
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Howard Frankl".

Howard Frankl

RECEIVED

EPA
CORR. CONTROL

39976

90NOV 13 AM: 26

Tim Kiley
1122 6th St. #306
Santa Monica, CA 90403

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Tim Kiley

RECEIVED
EPA
CORR. CONTROL
39935
90NOV 13 A10: 03

MR. WILLIAM K. REILLY
ADMINISTRATOR
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

NOVEMBER 6, 1990

DEAR MR. REILLY:

I READ WHERE THE ETHYL CORPORATION HAS PRODUCED ANOTHER ADDITIVE FOR OUR GAS TANKS. THE FIRST ONE WAS AN ENVIRONMENTAL DISASTER (LEAD) AND IT IS SUGGESTED THEIR SECOND ATTEMPT USING MANGANESE WOULD ALSO POSSESS THE POTENTIAL OF AFFECTING LIFE ON PLANET EARTH. HOPEFULLY, OUR EXPERIENCE WITH LEAD HAS TAUGHT US A LESSON. WE DO NOT NEED ANOTHER FIFTY YEARS OF HEALTH THREATS. LET'S SEND THE ETHYL CORPORATION BACK TO THE DRAWING BOARDS AND REJECT THEIR MIRACLE ADDITIVE AS THE DEVIL IN DISGUISE.

I LOOK FORWARD TO MEETING YOU AT THE HUGH MURPHYS IN CONWAY, ARKANSAS ONE OF THESE DAYS. BEST OF LUCK AND GOOD FORTUNE.



CHARLES R. TILLEY

3226 BENDA STREET: LOS ANGELES, CALIFORNIA 90068

RECEIVED

EPA

CORR. CONTROL

39936

90 NOV 13 A10:03

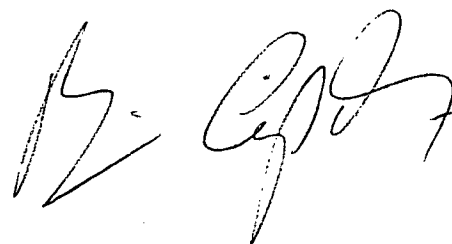
BRIAN LIPCHIK
PHOTOGRAPHY

Dear Mr. Reilly,

As a proud American, a concerned environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny the Ethyl Corporation's application for their product "Hitec 3000." This is a manganese based gasoline additive which has been proven to be exceedingly toxic.

Thank you for your attention and your concern.

Sincerely,

A handwritten signature in dark ink, appearing to read 'B. Lipchik', with a stylized flourish at the end.

Brian Lipchik

RECEIVED

EPA
CORR. CONTROL

39945
90NOV 13 A 9:59

Dr. & Mrs. Arthur Rubin
P.O. Box 9245
Brea, CA 92622-9245

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Art & L. Rubin

RECEIVED

EPA

CORR. CONTROL

39946

90NOV 13 A 9: 58

Judy Code

852 North Occidental Blvd., Los Angeles, CA 90026 (213) 484-9323 Fax: 484-9184

22 October 1990

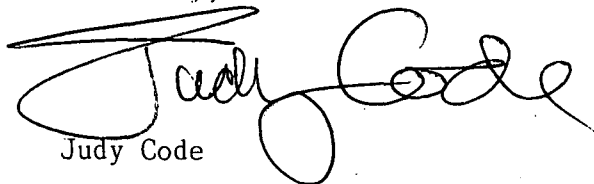
William K Reilly
Administrator
United States Environmental Protection Agency
Washington D.C.

Dear Administrator Reilly,

I have recently been informed by the Environmental Defense Fund (an organization of which I am a member) that the Ethyl Corporation has and application for a manganese based gasoline additive called "HiTec 3000". Manganese released into the environment at as an attempt to handle emissions' negative impact is so short sighted as to be laughable. The long term effects of manganese released under these conditions has not been determined by thorough study. Being aware of it's toxic nature, however, leads one to the very likely suspicion that Ethyl Corporation is in danger of repeating it's 'leaded-gas' fiasco that has resulted in the chronic lead poisoning of millions of children on an epidemic scale.

I urge you to deny Ethyl Corporation's application for 'HiTec 3000'.

Sincerely,


Judy Code

RECEIVED

EPA
CORR. CONTROL

39955

90NOV 13 A 9: 54

William K. Reilly
EPA Administrator
Washington D.C. 20460

November 7, 1990

I am extremely concerned over the possible use of methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive without significantly more research.

I am worried that the problems we discovered with leaded gas will be repeated with manganese.

As a ~~nurse~~ and Certified nurse-midwife, I wonder about the effects on pregnant women and their fetuses and children.

I urge you to reject entirely Ethyl Corporation's application to use MMT.

Thank you for your concern,


Fran Kinkead C.N.M.

11-8-90

RECEIVED

EPA
CORR. CONTROL

40207
90NOV 14 12:09

REBECCA L. JOHNSON, Ph.D.

319 TAPLOW ROAD
BALTIMORE, MARYLAND 21212

Psychologist
License # 1993

12 Novewmber 1990

William K. Reilly
EPA Administrator
Washington, D.C. 20460

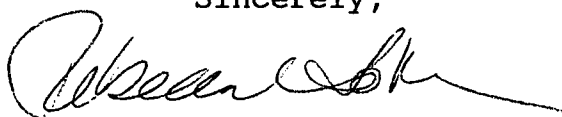
Dear Mr. Reilly:

As a psychologist who has worked with many children damaged by exposure to lead, I am deeply concerned about the Ethyl Corporation's recent request for approval to use methycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. It is my understanding that any reduction in tailpipe emissions caused by the addition of MMT would be very small and would pale in significance next to the dangers of using such an additive. Manganese at high dosages is a neurotoxin causing irreversible damage; there is evidence that fetuses, young children, and the elderly may be expecially vulnerable to its effects. There has been no investigation of the safety of chronic, low-dose human exposure. Applying what we have learned from our sad experiences with lead, we know that contamination of the urban environment (dust, soil, and air) by manganese, should it prove to be hazardous to heatlh, will be extremely difficult and costly to remedy.

Please reject Ethyl's request to use MMT.

Thank you for your attention.

Sincerely,



Rebecca L. Johnson, Ph.D.

RECEIVED

EPA

CORR. CONTROL

40341

90 NOV 15 A10: 51

Box 674
Dubois Wy. 82513
Nov. 6, 1990

EPA Administrator
William K. Reilly
Washington, D.C. 20460

Dear Mr. Reilly:

I write to urge most strongly that Ethyl Corporation's application to use MMT as a gasoline additive be rejected.

We are still paying the price to the public health caused by Ethyl's gasoline additive, tetraethyl lead despite the considerable reduction imposed by the use of unleaded gasoline..

Now Ethyl comes forward to request this new additive, MMT, using virtually the same arguments they used for lead in 1925: that the manganese released into the environment will be negligible and that it is only toxic at high doses in industrial settings.

While we do not know what the chronic low dose effects of human exposure to manganese are, our tragic experience with lead makes it imperative that we not repeat the

mistakes made with tetraethyl lead as a gasoline additive.

Please reject their application and suspend all currently permitted use of manganese as a gasoline additive in the U.S.

Sincerely,

Gladys Hawley

RECEIVED

EPA
CORR. CONTROL

39912

90NOV 13 AM : 22

Nov 7, 1990

Dear Mr. Reilly:

I'm writing to urge you to
reject Ethyl's application to use
a manganese additive to gasoline.

After seeing all the damage done
to children from lead poisoning,
I'm surprised at the audacity
of Ethyl.

Please reject this proposal.

Sincerely,

Karen A. Garrett

RECEIVED

EPA
CORR. CONTROL

40053

90NOV 13 P 3:11

James W. Tummins

599 Wright Street 102, Lakewood, Colorado 80228

Telephone: (303) 988-4221

Recycled Paper

November 9, 1990

William K. Reilly
E.P.A. Administrator
Washington, D. C. 20460

Dear Mr. Reilly,

In recent weeks, the Ethyl Corporation has applied to use mehtycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. The Ethyl Corporation contends that the manganese that will be put into the air is negligible and not hazardous. They made the same claim about lead in 1925.

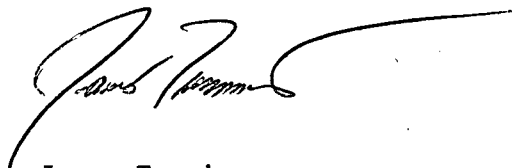
Current research has indicated that manganese in high concentrations is a human neurotoxin. The effects of manganese are persistent and irreversible, resulting in severe impairments in movement and mental state.

There is also the issue of what we do not know. We do not know what the chronic, long-term low dose effects of human exposure to manganese. We do not know what the "safe" level of manganese exposure is, especially for the young, and old, who are usually more sensitive to environmental contamination. We do not know if manganese is carcinogenic. There is evidence that it can break DNA, suggesting that it is carcinogenic.

We do know, from our experience with leaded additives, that the long term effects of contamination and pollution cannot be easily or quickly reversed. We have the opportunity to apply the knowledge that we have gained over the last 50 years from our experience with lead to a new and similar experience. To disregard that experience is to invite a repetition of the catastrophe that we now face with lead pollution. As a society we cannot afford a repetition of that experience.

Please reject Ethyl Corporation's application to use MMT as a gasoline additive in the United States.

Sincerely,



James Tummins

RECEIVED
EPA
CORR. CONTROL
40048
90NOV 13 P 3:12

Ronni Rubin
P.O. Box 9245
Brea, CA 92622-9245

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Ronni Rubin

Ronni Rubin

RECEIVED

EPA

CORR. CONTROL

40044

90NOV 13 P 3: 16

Janice Tuzzolino
6765 Whitman Dr.
Beverly Park, Ca. 90620

11-8-90

Dear Sir,

I work in a public school. We are and will be seeing many more children who have social and academic problems.

All these children can't be "drug babies". Perhaps some of the problems are caused by the toxins in our environment. - We can't afford more health problems!

I urge you to please reject the new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Thank you,

Janice Tuzzolino

RECEIVED

EPA

CORR. CONTROL

40259

90NOV 14 P12:49

November 6, 1990

Mr. William K. Reilly, Director
Environmental Protection Agency
Washington D.C. 20460

Dear Mr. Reilly:

I've been informed that your agency is considering an application from the Ethyl Corporation for a new gasoline additive, MMT, which contains the element manganese. I also understand that there are no scientific studies on the long-term, low-dose health effects of manganese on human beings, or the effect of this substance on the environment as it gradually accumulates.

If this information is correct, it would be hard to imagine that your agency would seriously consider approving such an application without the most complete and rigorous kind of scientific justification. However, as I am a newcomer to the world of regulatory agency politics, I would like to know the current status of this application, your thinking on the merit of it, and what kind of experimental studies you would find necessary to justify approval of this additive.

Yours sincerely,



Meyer Scharlack
3330 Bona Street
Oakland, CA 94601

RECEIVED

EPA
CORR. CONTROL

39893

90NOV 9 P 3: 13

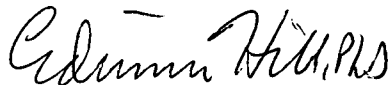
Edwin L. Hill, Ph.D.
2121 South 19th Street
Tacoma, Washington 98405

William K. Reilly
EPA Administrator
Environment Protection Agency
United States Government
Washington, DC 20460

Dear Mr. Reilly,

It is my understanding that the Ethyl Corporation has recently introduced a manganese based gasoline additive, Methycyclopentadienyl Manganese Tricarbonyl (MMT), for consideration by your agency to be approved for inclusion in gasoline as an octane enhancer. I have grave doubts that this additive would have any worthwhile benefits to offer the United States population given the lack of any independent objective evidence demonstrating Ethyl Corporation's claims about its value. More importantly, however, I am concerned about the potential damaging effects that could be experienced by the public from the neurotoxic effects of wide spread distribution of such a toxic metal as Manganese into the environment through automobile and truck exhaust fumes. Indeed, given the past performance of the Ethyl Corporation in terms of product development, there is every reason to expect that their new MMT gasoline additive will be every bit as much the "gift of God" that Tetraethyl Lead was when they introduced it in 1925. I strongly urge you to lead your agency in adopting a strict and conservative scientific evaluation of the costs and benefits of MMT from both the short term and long term perspectives. Let's not forget the length of time it took to realize the damaging effects of excessive exposure to lead in the environment and the difficulties encountered in removing it from wide spread public usage. Thank you for your attention and consideration of this matter.

Sincerely,



Edwin L. Hill, Ph.D.

RECEIVED

EPA

CORR. CONTROL

39894

90NOV 9

P 3: 13

November 4, 1990

Mr. William K. Reilly
Administrator
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly:

We are writing to communicate our deep concern over the fact that Ethyl Corporation is attempting to win approval to market "HiTec 3000." The manganese contained in this additive is a heavy metal with the very real potential to cause major public health problems - just like the leaded gasolines this same company foisted on us in the 1920s.

We strongly request that the EPA refuse to allow Ethyl Corporation to market this dangerous new additive.

Sincerely,



Michelle van Schouwen



Stephen van Schouwen

11/14/90

Dr. Hari Bhajan Singh Khalsa
Hari Bhajan Kaur Khalsa
1573 Cardiff Ave.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

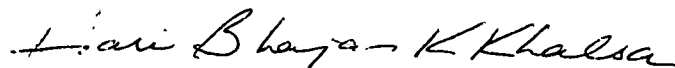
Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Dr. Hari Bhajan Singh Khalsa



Hari Bhajan Kaur Khalsa

RECEIVED

EPA

CORR. CONTROL

39993

90NOV 13 All: 17

November 5, 1990

Richard K. Barbieri
4831 S. Dunkirk Way
Aurora, CO 80015

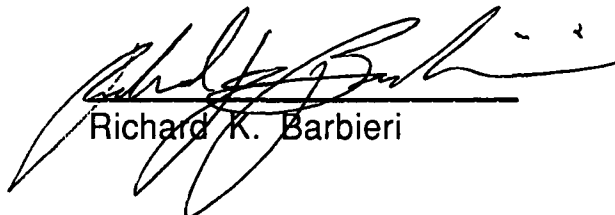
William K. Reilly
Environmental Protection Agency
401 M Street Southwest
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to express my concern with the possible registration of the Ethyl Corporations product MMT for use as an additive in gasoline. The environmental effects of long term exposure to low levels of manganese are unknown. I do not think we should register a product which has unknown effects. In 1925, lead was added to gasoline even though the "experts" said it would cause no harm. This has proved to be totally erroneous with lead being one of the top toxic pollutants of the country, especially of children in urban areas. I believe that we should not repeat this disaster. Please do not allow manganese as an additive to gasoline without a major long term study on the effects of low levels of manganese on the environment and humans. It is better to "err" on the side of caution than to poison a new generation.

Thank you for your time and effort on this issue.

Sincerely,



Richard K. Barbieri

RECEIVED

EPA

CORR. CONTROL

39988

90 NOV 13 AM: 19

November 2, 1990

William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly,

I had only half a day to get signatures, I am positive I could have gotten many more.

We, the public, object strenuously to the idea (or reality) of any gasoline additive with manganese. The effects that we know already are too serious. For example, manganese is one of the problems in harbor in the NE United States. We certainly do not need it spread to the Midwest through car exhausts.

Thank you for receiving our petition.

Yours truly,

Nancy C. Morey, Ph.D., Ph.D.

R.R. 1, Flint Hills

Macomb, Illinois 61455

RECEIVED

EPA EPA
CORR. CONTROL CORR. CONTROL

39399

NOV 7 90 NOV 7 AM 11:00

20460

STOP HiTec 3000
AN OPEN PETITION TO THE EPA

We, the undersigned, strongly object to the petition of Ethyl Corporation of America to ask the EPA to approve its new gasoline additive called "HiTec 3000." This additive contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. We do not need another heavy metal released into our environment. The long-term effects on human health are unknown, and we do not wish to be the subjects of an experiment. We ask that you refuse permission for HiTec 3000.

Name	Address	Date
Shirley Rhoads	1043 50 th Ave Apt. 1A East Moline, IL 61244	11/2/90
Jani Young	P.O. Box 583 Keokuk, IA 52632-0583	11/2/90
Adam Dubaudon	700 LINDEN LANE APT. 105	11/02/90
Bruce Bleck	200 Fawn Ridge Macomb, IL	11/2/90
Cherie Kuenig	626 W Murray Macomb, IL	11/2/90
Brad Siegel	501 W ADAMS Macomb, IL	11/2/90
Michael Henny	1335 Higgins Macomb, IL	11/2/90
Michael Schip	235 W. CACKOUN MACOMB, IL	11/2/90
Ron Noble	733 N. Charles Macomb, IL	61455 11/2/90
Denise Sheer	311 WIGWAM Hollow Macomb, IL	61455 11/2/90
Doreen Burgess	723 Higgins Macomb, IL	61455 11/2/90
Jim Sapa	1608 Higgins Macomb, IL	61455 11/2/90
Sharon Hurdley	326 S. Johnson Macomb, IL	61455 11-2-90
Linda Thibault	133 E. Jefferson Rushville, IL	62681
Angelica Bratcher	1535 Janner Hall Macomb, IL	61455
J. Darrin Haller	8 Hickory Bow Macomb, IL	61455 11-2-90
Bab Choi	504 Villa Westbrook Macomb, IL	61455 11-2-90
Janice	525 E. Grant Macomb, IL	61455
Harold Morey	R.R.1 Macomb, IL	61455
Robert V. Mang	R.R. #1 Macomb, IL	61455

Name

Address

Date

1

112 Moorewood Ave.
Avon Lake, OH 44012

November 2, 1990

Mr. William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly:

This is in regard to Ethyl Corp. of America's request to the EPA to approve a gasoline additive it calls "HiTec 3000". I understand that "HiTec 3000" contains manganese which is a toxic heavy metal.

We certainly don't need this added to the environment! High dosages of manganese are known to be a human neurotoxin with persistent, irreversible pathological effects on the brain structure and can affect people of any age, even fetuses.

Ethyl Corp. was also responsible for promoting leaded gas and look at the "monster" that has created. Lead poisoning around the world affecting millions of children. The cleaning up of lead contamination will be both slow and expensive!

I sincerely hope that the EPA will BAN the Ethyl Corp. from using "HiTec 3000"!

Sincerely,

A handwritten signature in cursive script that reads "Shirley Blaser".

Shirley Blaser

RECEIVED
EPA
CORR. CONTROL

39609
90NOV 8 4:38

Rosé T. Sullivan
1841 North 16th Avenue
Phoenix, Arizona 85007
(602) 271-0779

November 4, 1990

William K. Reilly, Administrator
Environmental Protection Agency
Washington, DC 20460

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use methycyclopentadienyl as a gasoline additive. Please!

Seldom are we able to avail ourselves of the lessons of history, yet we have 65 years' evidence of air poisoning -- and ground and water poisoning -- due to leaded gasoline, introduced in 1925 by the Ethyl Corporation.

The parallels between Ethyl's 1990 proposal now before you to use manganese, and Ethyl's 1925 lead proposal are deadly frightening. We must not allow it. Please heed the environment! Please listen to the scientists, the naturalists, and all the ordinary human beings who are affected by abuses to our environment.

The hard won removal of most lead from gasoline represents one of EPA's most significant public health achievements. We must continue our vigilance in the struggle to protect our environment against all poisons and would-be poisoners.

Yours truly,

A handwritten signature in cursive script that reads "Rosé Sullivan".

Rosé Sullivan

RECEIVED

EPA

CORR. CONTROL

39612

90NOV 8 9:39

Mary Lou Rosczyk
16172 Ballantine Ln.
Huntington Beach, CA 92647

8 November 1990

Dear Mr. Reilly,

I am very concerned about the Ethyl Corporation's proposal to the Environmental Agency to approve adding MMT (methycyclopentadienyl manganese tricarbonyl) to gasoline. Haven't children and urbanites suffered enough from leaded gasoline and the epidemic of lead poisoning it has spawned in the United States? Do we have to go through the same scenario with manganese? Have we learned nothing from history?

Over fifty years ago lead-based additives were blithely approved for gasoline. We are still paying the price. Doubly horrifying is the fact that a proposal to increase the use of lead additives was almost approved several years ago.

Now a proposal is before the EPA to approve use of another essentially untested metal-based gasoline additive. The little we do know about manganese shows that it can break DNA chains. This indicates it may be carcinogenic.

Americans should not have to be the guinea pigs again for the effects of a metal-based gasoline additive. I urge you to reject Ethyl Corporation's application for use of MMT as a gasoline additive. Many more carefully monitored and long range studies are necessary before use of such an additive be considered for EPA approval.

Sincerely,

Mary Rosczyk

1 12:15

RECEIVED
EPA
CORR. CONTROL

4/10/54

SONOV 13 P 3: 10

November 6, 1990

TO: MR. WILLIAM K. REILLY

FROM: LEE C. HOOVER

RE: MMT

Dear Sir,

It has recently come to my attention the application by the Ethyl Corporation seeking approval of a new gasoline additive, methycyclopentadienyl manganese tricarbonyl (MMT).

As a concerned member of the Environmental Defense Fund, I strongly urge you to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Both what we know and what we don't know about the likely toxic effects of adding large amounts of manganese to the environment must persuade you to reject this application. Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

Thank you for your time and consideration. I am counting on you to do the right thing.

Sincerely,


Lee C. Hoover

RECEIVED

EPA

CORR. CONTROL

40036

90NOV 13 P 3:17

Rama Kaur Khalsa
1717 Preuss Rd.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460


Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Rama Kaur Khalsa

RECEIVED
EPA
CORR. CONTROL
40039
90NOV 13 P 3:17

October 31, 1990

William K. Reilly
Administrator
Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Reilly,

I am very concerned with the Ethyl Corporation's request for approval of its new gasoline octane-enhancer methycyclopentadienyl manganese tricarbonyl (MMT). Beyond the fact that it enhances octane, we know only one other thing about this compound: it will accumulate in our environment. What are the implications, the effects, the short and the long term consequences?

We gambled in 1925 when Ethyl Corporation brought us tetraethyl lead. We lost. Only through Environmental Protection Agency's efforts are our gasolines practically free of lead today, over 50 years later. We will live with the results of lead in our environment for many more years.

Please do not allow Ethyl Corporation to bring MMT into the market place until they have provided all data necessary to guarantee the safety of all organisms, now and in the future.

Sincerely,



Charles H. Goodwin
Rt. 1, Box 95A
Alachua, Florida 32615

RECEIVED

EPA

CORR. CONTROL

39315

90NOV 6 P1:43

Mario E. Catala II
9532 Oakenshaw Drive
Manassas, VA 22110

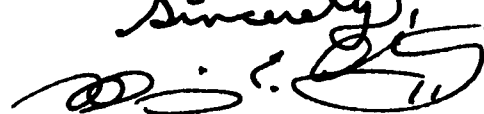
31 October 1990

Mr. William K. Reilly,
Administrator
E. P. A.
401 M Street, S.W.
Washington, D. C. 20460

Dear Sir:

Had previous governmental agencies exercised prudence and caution in approving the use of additives in gasoline, as well as lead in solder and paint, asbestos in insulation and brake lining... we would probably not have many of the problems we have today and many lives would have been spared.

Please, before you approve the use of manganese-based additives for gasoline, as proposed by the Ethyl Corporation - the same one that gave us the lead additive, be absolutely certain that future generations will not be paying for your decision. If you harbor any doubt, please do not authorize it, it is far less harmful.

Sincerely,


101 63182

RECEIVED
EPA
CORR. CONTROL
38747
90NOV 1 P3:25

Tim Spindler
958 Main St
Eau Claire, WI 54701

Oct. 28, 1990

Dear William K. Reilly,

I would ask that you oppose
the allowance of the additive, MMT,
to gasoline. We are not certain of
its long ~~term~~ ^{term} effects, ~~and~~ especially
when one considers the past history
~~of~~ of additives with the use
of lead.

Sincerely yours,

Tim Spindler

101 63.15

RECEIVED

EPA

CORR. CONTROL

38764

90NOV 1 P 3:12

Kobushyn
51 Lloyd Avenue
Syracuse, NY 11563

Oct 25, 1990

Dear Mr. Kelly,

I and my husband are writing to urge that you reject Ethyl Corporation's application to use MMT as an octane enhancing gasoline additive.

Our inner cities are polluted enough by auto and truck and bus emissions. Please be sensible and stop this additional pollutant from entering the air small children have to breathe.

We urge you to reject the application and suspend all currently permitted use of manganese as a gasoline additive in the United States. Sincerely,

Ted Kobushyn Kathy Kobushyn

RECEIVED

EPA

CORR. CONTROL

30902

90NOV 1 A10:33

October 29, 1990

Dear Mr. Reilly,

I hear that Ethyl Corporation is applying for approval for a gasoline additive, HiTech 3000.

I understand that it contains manganese, which is known to produce symptoms of Parkinsons.

My father spent the last 7 years of his life in a desperate, agonizing battle with Parkinsons. Toward the last, his personality and actions were unrecognizable as the man I once knew.

Now my brother-in-law is going down that same road. It's terrible to watch this tragedy again.

Do not give permission for the use of HiTech 3000. Our health is besieged every day with many pollutants. Do not allow another one out.

Sincerely,

Rea

Mrs. Bob Shepperson
352 Gorman
Belen
NM 87002

RECEIVED
EPA
CORR. CONTROL

90NOV 5 A10:00

31 October 1990

Dear Administrator Reilly,

As a concerned citizen I strongly urge you to deny Ethyl Corporation's application for "HITEC 3000", a TOXIC MANGANESE-based gasoline additive.

I am so tired (AND soon to be SICK if you allow this of corporations putting DOLLARS over humans!

J R Hamm
PO Box 51
Keswick, Va
22947

RECEIVED

EPA
CORR. CONTROL

90NOV 5 9:59

Oct 23, 1990
Arlington Hts, Ill.

Dear Mr. Reilly,

I am writing to ask you to not grant EPA approval of the gasoline additive "HiSec 3000". In light of the tragic effects of lead from gasoline, now is not the time to add another toxic heavy metal (manganese) to the environment. Manganese is contained in "HiSec 3000". We do not need this additive.

Sincerely,

Bonnie L Weiss
403 W. Noyes
Arlington Hts., Ill.
60005

RECEIVED
EPA
CORR. CONTROL

90NOV 5 A10: 03

1870 Tacoma Ave.
Berkeley, CA 94707
October 27, 1990

William J. Reilly, Administrator
Environmental Protection Agency
401 L Street SW
Washington, DC 20460

Dear Mr. Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "Ethec 3000," a toxic manganese-based gasoline additive.

To approve the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Ethyl Corp. has ignored contrary evidence in citing bits of data to support its contention that the use of methycyclopentadienyl manganese tricarbonyl (MT) will not increase airborne manganese concentrations over cities. It provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor--more important--any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

This new additive is NOT safe. Please, do not approve the application.

Sincerely yours,

Peggy Reid
Peggy Reid

RECEIVED
RCA
COMM. CONTROL

SD NOV 2 P 1:53

Cheryl Smith
5135 1/2 W. 20th St.
Los Angeles, CA 90016

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly, '

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Cheryl Smith

Jan Zlotnick
8575 Loretto
Cotati, CA 94931

William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

28 October 90

Dear Mr. Reilly,

Just a brief note:

DO NOT ALLOW THE APPROVAL OF Hi Tec 3000!!

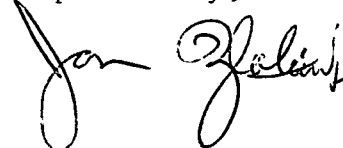
The credibility of the Bush administration is suffering terribly these days, and bowing to Ethyl Corporation's misrepresentation of HiTec 3000 as safe and environmentally beneficial will further compromise its credibility.

HiTec 3000 is not safe, just as lead was not safe as a gasoline additive. It contains manganese, only one of whose complications are Parkinson symptoms.

There are lots of things we can do as a country to improve energy efficiency and safety. HiTec 3000 is not one of these things.

Don't put us at risk! Don't approve HiTec 3000.

Respectfully,

A handwritten signature in cursive script, appearing to read "Jan Zlotnick".

RECEIVED
EPA
CORR. CONTROL

90NOV 2 P 1:49



Learning Disabilities Association of America

4156 Library Road • Pittsburgh, PA 15234 • 412/341-1515 • 412/341-8077 • FAX 412/344-0224

November 1, 1990

Executive Committee

PRESIDENT
LANELLE GALLAGHER
I VICE-PRESIDENT
ANN VINUP
II VICE-PRESIDENT
MARY COTTER
SECRETARY
JUSTINE MALONEY
TREASURER
SHARON BLOECHLE
BOARD LIAISON
ANN KORNBLIT
IMMEDIATE PAST PRESIDENT
HELENE GRUBER

Board of Directors

VIRGINIA ANDERSON
DALE BROWN
ROB CRAWFORD
CHARLOTTE EDWARDS
MAUREEN FERRELL
SUZANNE FORNARO
PATRICIA GAWNE
PAT PERRY KISSIRE
PAT LILLIE
REED MARTIN, ESQ.
JOE SWALWELL
MARIANNE TOOMBS
POLLY TYNER
FRANCES WRIGHT

Professional Advisory Board

CHAIRMAN
DORIS JOHNSON, PH.D.
HONORARY CHAIRMAN
SAMUEL KIRK, PH.D.
BARBARA BATEMAN, PH.D.
KENNETH BONNET, PH.D.
WILLIAM BYRNE, PH.D.
JAMES CHALFANT, PH.D.
BARBARA CORDONI, ED.D.
ELIZABETH DANE, PH.D.
MARTHA DENCKLA, M.D.
DONALD DESHLER, PH.D.
PAUL GERBER, PH.D.
ROSA HAGIN, PH.D.
BARBARA KEOGH, PH.D.
JEAN LOKERSON, PH.D.
EDWIN MARTIN, PH.D.
MICHAEL MCCUE, PH.D.
LARRY SILVER, M.D.
JOSEPH TORGESON, PH.D.
FREDERICK WEINTRAUB

National Executive Director

MRS. JEAN PETERSEN

William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

The Learning Disabilities Association, LDA, urges you to deny the Ethyl Corporation's request for approval of the use of methylcyclopentadienyl manganese tricarbonyl (MMT) as an additive to gas until adequate testing is done to measure the health effects of chronic low-dose exposures of mercury, particularly on the fetus and young children.

LDA has long advocated for the reduction of lead, mercury and other heavy metals in the environment because they are known causes of learning disabilities. The structural and pathological effects on the brain and impairments of motor and mental function of large doses of MMT on humans are well known. The devastating and irreversible effects of the heavy metals lead and mercury on the fetus and developing brain are equally well known. There is no reason to believe that the heavy metal manganese would not have similar effects on the developing brain.

In view of our experiences with lead and mercury, the minor pollution reducing benefits of MMT should not outweigh the long-term, and potentially irreversible health risks of using MMT.

Sincerely,

LaNelle Gallagher,
President, LDA

RECEIVED
EPA
CORR. CONTROL
39230
90 NOV 6 AIO: 07

RAINBOW CONCEPTS

Arthur E Strauss, Proprietor
 Cynthia V Strauss, Most Patient Gopher
 187 Acton Rd, Columbus, Ohio 43214
 Home Phone 614-267-4047
 18 October 1990

William K Reilly
 EPA Administrator
 Washington, DC 20460

Dear Mr Reilly,

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. The Ethyl Corporation's ad campaign pushing its new additive containing the heavy metal manganese demonstrates once again the cynical guinea-piggery of this, one of the oldest of the petrochemical industry's bad guys.

PLEASE, in the name of my grandchildren and their children, (if they live long enough to have them), refuse to authorize the use of Ethyl Corp's new additive and stop forthwith any use already allowed. Yes, Ethyl has platoons of lawyers and platoons more of scientists who are "paid-to-produce-negative-results scientists". We understand that the full power of the petrochemical industry will be used behind the scenes to preserve the deregulation disgraces of the Reagan era. But don't let us down. Fight this in the media and in your agency and in the courts.

Please let us know what your intentions are up front. We promise we will play our activist/concerned citizen roles to the hilt in supporting your responsible actions. Groups like the Environmental Defense Fund, which has alerted us to this danger, will be monitoring your actions, as well as the counteracting manipulations of government and media by the Ethyl Corp.

Cindy and I are now looking hard at the shifts toward accommodation with the polluters which are taking place in the larger, more heavily lobby-oriented environmental organizations. It is hard for us to imagine that the Ethyl Corp would deliberately repeat the disastrous game it played with public health. It seems much more likely that this action is a diversion to drain off environmental advocacy energy, so as to cover up some far more insidious and damaging plan for guinea-pigging the American population. That guinea-piggery is a commonplace on the American scene cannot be disputed. Please don't be a player in that game. From your position, you should be able to expose it and to speak out for the population which looks to you for the Environmental Protection your agency's title mandates, but which two successive Administrations have successfully emasculated.

Looking forward to hearing from you,

Sincerely,

Arthur E. Strauss

Arthur E Strauss

100%
 Recycled Paper

430-10 LL-132A

RECEIVED
EPA
CORR. CONTROL
37199
90OCT 23 AM: 24



E. Lochner Rosso, D.C.

October 29, 1990

Mr. William K. Rielly
Environmental Protection Agency
401 M. Street S. W.
Washington, D.C. 20460

Dear Sir:

I would like to express my support for the fuel additive HiTec 3000, product of the Ethyl Corporation, which has been added to gasoline in Canada for the last 10 years with the synificant reduction in tailpipe emissions and increased fuel efficiency produced by this product. I cannot imagine why the United States has not used it sooner.

Please give this matter your consideration for the sake of our enviornment.

Sincerely,

E. Lochner Rosso R

E. Lochner Rosso, D.C.

ELR/rh

RECEIVED

EPA

CORR. CONTROL

39106

90NOV 5 A10:07

Warren J. Dew
20 Battlemarch Way
Woburn, MA 01801
30 October 1990

Mr. William K. Reilly
Environmental Protection Agency
Washington, DC 20460

I understand that the Ethyl Corporation is applying for EPA approval of a gasoline additive, Methycyclopentadienyl Manganese Tricarbonyl (MMT), as a replacement for tetraethyl lead as an octane enhancer. I believe that they are arguing that the potential atmospheric manganese concentrations from the use of MMT have not been shown to cause adverse health effects

Given the decades it took to establish the adverse effects of lead, I have grave reservations about the use of a new metallic compound in gasoline. This is particularly true for metals like manganese which may be toxic at high doses. It seems likely to me that the adverse health effects of low concentrations of metals are not limited to lead, and are in fact likely to be caused by manganese as well. In fact, it seems to me quite conceivable that the same chemical characteristics that enhance octane also cause adverse health effects.

In light of the potential for widespread introduction of another health hazard, I urge you to reject Ethyl's proposal to use MMT as a gasoline additive.



Warren J. Dew

RECEIVED
EPA
CORR. CONTROL

90NOV 5 A10:06

Oct. 30, 1990

To: William K. Reilly
Administrator
Environmental Protection Agency
Washington, D.C. 20460

From: Samuel Adams
47 W. 14th Street, Suite 302
New York, NY 10011

Re: Ethyl Corporation's application to approve MMT as a gasoline additive

Dear Mr. Reilly;

I am opposed to Ethyl Corporation's application on the grounds that the manganese in their additive is not proven to be harmless even at low levels over an extended period of time.

These quick fixes, I feel, are the wrong approach to lessening toxic metals and chemicals in the environment. Considering the damage that lead, mercury, and cadmium have wrought in the New York metro area alone, I strongly urge you to consider banning MMT as a gasoline additive. Trust me, the atmosphere is bad enough in this area as it is without throwing another wild card in the air.

A greater concentration of resources on mass transit and higher user fees on single-passenger autos in this area would be a more logical approach. It wouldn't hurt to accelerate the use of natural gas in buses, trucks and other urban vehicles either. Finally, a popular political move, at least in New York City, would be a limousine tax, since the only difference between these and regular car services is conspicuous consumption and a highly visible waste of fuel and road space.

Thank you for your attention.

Sincerely,



Samuel Adams

RECEIVED
EPA
OGGR. CONTROL

90NOV 5 10:06

Nirinjan Kaur Khalsa
P.O. Box 351149
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

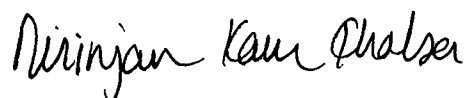
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Nirinjan Kaur Khalsa

RECEIVED

EPA
CORR. CONTROL

90NOV 5 A10:06

Don Strachan
21279 Entrada
Topanga, CA 90290

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

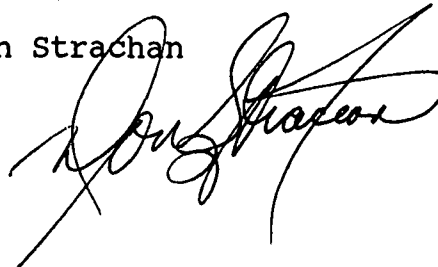
Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Don Strachan

A handwritten signature in dark ink, appearing to read 'Don Strachan', with a large, sweeping flourish extending from the bottom right.

RECEIVED
EPA
CORR. CONTROL

90NOV 5 10:05

Anne Petrocci
59 Tuxedo Avenue
Hawthorne, NJ 07506

October 30, 1990

Mr. William K. Reilly,
Administrator
United States Environmental
Defense Agency
Washington, DC 20460

Dear Administrator Reilly:

I believe that the Ethyl Corporation's "Hi-Tec 3000" manganese-based gasoline additive will be a major detriment to our environment and urge you to deny their application for its use.

Please help us protect our environment and well being from such obvious abuses.

Sincerely,


Anne Petrocci

AP/bt

Office of Human Resources

TO: ALL MANAGEMENT & PROFESSIONAL EMPLOYEES

SUBJECT:

FROM: Peter Bittle
Director for Administrative Services

REGULATIONS ON LIMITATIONS ON THE
RECEIPT OF HONORARIA & REIMBURSEMENT
FOR TRAVEL EXPENSES

H.R. BULLETIN NO: 90-09

DATE: 7/17/90

The State Ethics Commission has adopted final regulations covering the limitations on the receipt of honoraria and reimbursement for travel expenses. The regulations set forth conditions under which State employees may accept an honorarium and under which reimbursement for travel expenses related to the employee's official duties may be accepted (other than reimbursement from Rockland Psychiatric Center).

Honorariums offered to State employees for services related to his/her State job may not be accepted by an employee but may instead be paid directly to the State's General Fund. Honorariums offered to State employees for services not related to his/her State job may be accepted provided certain conditions are met.

Travel expenses related to a State employee's official duties may be accepted also provided certain conditions are met.

Employees who have received, will receive, or have been offered either honoraria and/or travel expenses for activities whether related to his/her official duties or not, should obtain a copy of Ethics Advisory Notice #90-9 from the Human Resources Department to insure compliance with the regulations established by the State Ethics Commission.

Forms OMH-E-1 "Request for Approval for Receipt of Honorarium" and OMH-E-2 "Request for Prior Approval for Reimbursement for Travel Expenses from Outside Organizations/Individuals" are to be used for the purpose of requesting appropriate approvals and are also available in the Human Resources Department.



Box 731
Pearl River, Ny 10965
10/29/90

Dear Mr. Rully,
I do not support the use of Hi-Tec 3000.
Please do not approve it.

Thank you.

Yours truly,

Brenda Melotkin

312 Griffin Avenue
Williamsburg, VA 23185
October 30, 1990

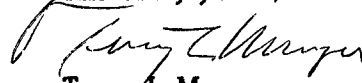
Mr. William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly:

I understand that the Ethyl Corporation is applying for permission to use MMT as an additive for gasoline. Everything I have seen suggests the MMT is extremely dangerous to life. I trust that you and your department will protect the American people and turn down Ethyl's application.

Thank you for your attention.

Sincerely yours,



Terry L. Meyers

10 2 23 13

RECEIVED
EPA
CORR. CONTROL
38998
90 NOV 2 P 2:13